

Integrated Resource Planning (R.20-05-003)

Filing Requirements Overview for February 1, 2023, IRP Procurement Compliance Filing & Data Request

January 4, 2023

1. Background:

In accordance with Decision (D.) 20-12-044 Ordering Paragraph 1, all load-serving entities (LSEs) who fall within the Commission's authority for Integrated Resource Plan (IRP) proceeding with procurement obligations included in D.19-11-016 who did not opt-out of providing capacity for their customers shall make compliance filings on February 1, 2023. Additionally, in accordance with D.21-06-035 Ordering Paragraph 3:

"All load-serving entities named in Table 6 of this order, plus the individual electric service providers who will receive their individual allocations confidentially from Commission staff, shall procure the September net qualifying capacity amounts given in Table 6, and shall file and serve on the service list of this proceeding or any successor proceeding compliance filings according to the schedule given in Table 7 of this order."

This Filing Requirements Overview is aimed to assist LSEs to meet both of these requirements.

For purposes of keeping CPUC's project status information up-to-date, LSEs are also required to provide information on the following project types. LSEs that are not required to make a D.19-11-016 or D.21-06-035 compliance filing may still be required to submit an RDTv3 due to the following request:

- LSEs should include any projects planned, in review, or in development as of 1/1/2023, or online after 1/1/2022, in the LA Basin local capacity area, even if not pursuant to either IRP procurement order.

The template, Resource Data Template version 3 (RDTv3), is posted on the CPUC IRP website (2022 IRP Cycle Events & Materials page) along with instruction documents. Each LSE should fully and accurately complete the RDTv3 in a way that adheres to the compliance requirements explained in this document and RDTv3 User Guide. RDTv3 indicates a major version. Minor version changes have and will occur. At the time of this publication the latest minor version is RDTv3 10/11/2022. LSEs should use the latest version of the RDTv3 posted to the CPUC's website. If RDTv3 versions are posted after January 1, 2023, LSEs will not be required to update to those versions.

The February 1, 2023, IRP Procurement Compliance Filing & Data Request does not replace the similar Procurement Status Data Request, issued most recently via email to LSEs on October 10, 2022. The IRP Procurement Compliance Filing & Data Request, and not the Procurement Status Data Request, will serve as the compliance check on individual LSE's compliance with IRP orders. While the templates involved are similar, they must each be submitted using their own instructions. The instructions for any fields that do appear on both templates should be the same and can be found in the RDTv3 User Guide.

Further, Commission staff has posted responses to Frequently Asked Questions (FAQ) about D.21-06-035 on the CPUC IRP website (IRP Procurement Track page), that are referred to in this Filing Requirements Overview. At the time of publication of this document, the latest D.21-06-035 FAQ document is version 1/4/2023.

2. Purpose:

This document guides LSEs and provides an overview of this data request and the compliance obligations, as well as instructs LSEs on how to file their RDTv3 and supporting documents with the CPUC. This document is intended to provide an overview of the filing requirements for D.19-11-016 and D.21-06-035 to assist LSEs with preparing their filings. This document is not intended to review all requirements. LSEs have an obligation to review this document in concert with all relevant Decisions, staff's responses to FAQ, and any other relevant Commission materials.

3. General Instructions:

- A. All LSEs who fall within the Commission's authority for the Integrated Resource Plan (IRP) proceeding with procurement obligations included in D.19-11-016 who did not opt-out of providing capacity for their customers are required to file updated procurement related data to satisfy the requirements of D.19-11-016 and D.20-12-044. Please see the detailed instructions in section 4.
- B. All LSEs who fall within the Commission's authority for the IRP proceeding and were given a procurement obligation for D.21-06-035 are also required to file procurement data and supplemental documentation pursuant to the requirements set in D.21-06-035. Please see the detailed instructions in sections 4 and 5.
- C. Staff notes Resolution E-5080, adopted Aug 6, 2020, authorizes Commission staff to cite LSEs "for non-compliance with mandatory filing deadlines and reporting requirements of the Integrated Resource Planning (IRP) proceeding." Further, Section 3.2 of the IRP Citation program states: "Specified Violation" also means the failure, absent an extension formally approved by the Commission's Executive Director or Deputy Executive Director, to submit other supporting data **clearly and reasonably** requested by Commission Staff that is reasonably related to the implementation of the Commission's Integrated Resource Planning Program."
- D. Additionally, LSEs should also include any projects planned, in review, or in development as at 1/1/2023, or online after 1/1/2022, in the LA Basin local capacity area, even if not pursuant to either IRP procurement order. Please see the detailed instructions in section 6.
- E. For purposes of determining contract status, use January 1, 2023, as the cutoff date.
- F. LSEs should review "RDTv3 User Guide" as Commission staff-provided comprehensive instructions.
 - a. Similar to previous rounds, comprehensive error checking will be conducted, after submissions are received, based on the rules and relationships spelled out in the User Guide using RDT Error Checking, Aggregation and Reallocation Tool (RECART) version 3 (RECARTv3).
 - b. Staff developed an error checking macro as part of RDTv3, based on the rules and relationships spelled out in the user guide. LSEs need to trace the errors identified by the macro and correct them before submitting. Macro runs are required for submittal. If an LSE has not run the macro, their submittal may not be accepted.

LSEs are required to correct errors wherever possible, but an error-free report sheet may not be possible under certain conditions. LSEs may advise staff when making their filings if any errors cannot be corrected.

4. Detailed Instructions on IRP D.19-11-016, D.20-12-044, and D.21-06-035 Requirements:

Per Ordering Paragraph (OP) 1 in D. 20-12-044, all LSEs with procurement obligations in D.19-11-016 who did not opt out of providing capacity for customers must submit compliance filings for backstop procurement on February 1 and August 1 of 2021, 2022, and 2023, in a format developed and disseminated by the CPUC for the publicly-available portion, containing information about progress toward achieving the electric capacity procurement requirements for 2021, 2022, and 2023. This same backstop process was adopted in D.21-06-035. LSEs should follow all applicable instructions here for reporting their D.21-06-035 resources as well. Section 5 below details additional instructions that are only applicable to D.21-06-035.

In addition to the RDTv3, self-providing LSEs must also submit information addressing Milestone 1, Milestone 2, and Milestone 3 for 2021, 2022, and 2023 in the compliance filing, as detailed in D.20-12-044.

LSEs are not required to re-submit supplemental documentation already provided to the CPUC in a previous compliance report, unless those materials have been amended or modified. LSEs must provide data in the RDTv3 for every D.19-11-016 and D.21-06-035 resource, even if the data has not changed since the last filing.

LSEs must include a table of contents cover page with their submittal that covers the following: document name, applicable resource, milestone requirement this document meets (e.g., site control or online status), applicable tranche or tranches, location of document in filing. LSEs submitting a remediation plan should include it in their table of contents. Below is a table LSEs may use for this cover page.

Please submit all supplemental documentation in a searchable format.

LSE Name IRP February 1, 2023, Procurement Report (sample format and information below)

Document Name	Resource Name	Milestone Requirement Met	Decision & Tranche(s)	Location
<i>LSEname_developer_ABCsolar_PPA</i>	<i>ABCsolar</i>	<i>Milestone 1 – executed contract</i>	<i>D.19-11-016, 1 & 2</i>	<i>Pg 17 of PDF</i>
<i>LSEname_developer_ABCstorage_PPA</i>	<i>ABCstorage</i>	<i>Milestone 2 – Notice to Proceed</i>	<i>D.21-06-035, 2023</i>	<i>3rd PDF in zipfile labeled: "ABCStorage_NTP"</i>

- For compliance with Milestone 1, self-providing LSEs must provide executed contracts for new construction, signed interconnection agreements, and provide evidence of site control with

signed land leases or title deeds (either accepted). Contracts should include a project timeline. LSEs should note if the project timeline is instead included with other documentation.

- Executed contracts must state the contracted net qualifying capacity (NQC) value, or the LSE should note where else in their filing the CPUC may verify the NQC value.
- For compliance with Milestone 2, LSEs must provide a "Notice to Proceed" or similar contractual evidence of construction commencement. Additionally, LSEs meeting part of their obligation with imports, demand response or sale of excess generation must submit executed contracts for these resources.
 - If the LSE does not have the "Notice to Proceed" documentation, they may submit what similar evidence they are able to provide that serves a similar purpose (i.e., updates on construction milestones).
 - Imports may not be more than 20% of an LSE's total obligation for D.19-11-016
 - LSEs procuring demand response resources must provide load impact protocols when available. If applicable, the LSE should also submit progress on rule 21 permits for DR contracts involving BTM storage. LSEs must provide NQC via Load Impact Protocols, contracted NQC, or an estimated NQC. LSEs should be sure to indicate via the "NQC_reporting_source," column if the provided NQC is an estimate.
- At the time of this filing, Milestones 1 and 2 should be met for all D.19-11-016 procurement and for the 2023 requirement of D.21-06-035.
- For Milestone 3, LSEs must provide evidence of online status and commercial operation. All D.19-11-016 tranche #2 resources were required online as of August 1, 2022. Please provide a copy of the commercial operations date (COD) notice you received. If that is not available (i.e., in the case of an existing resource), LSEs should provide where to find the resource on the CAISO Master Generating Capability list.
- Remediation Plan: When an LSE is notified of delay or contract failure, please include a remediation plan that describes the source of the delay, possible remediation that will be taken by the LSE, whether the LSE has notified the CPUC previously of the delay, and what substitute resources the LSE may be able to procure.
- Any instructions included in this Filing Requirements Overview, the RDTv3 User Guide, or the RDTv3, supersede previous instructions and should be followed. The format of the template has changed and some previous staff instructions and responses to FAQs are no longer applicable.
- Please note that staff previously instructed LSEs to create multiple lines in the data template if a project met multiple tranches. This is no longer necessary due to the drop-down list for the tranche column containing all possible combinations. Please only include one line for each project. If the contract has an NQC value that changes from year to year, please include that additional information in a note. When something fundamental about the contract changes (e.g., the resource's nameplate is expanded), please enter them as separate contracts (in separate rows). For more details, please read section 8 of the RDTv3_UserGuide.

5. Additional Instructions for D.21-06-035:

LSEs are also required to include and provide information in the RDTv3 for any projects intended to meet D.21-06-035 (the Mid-Term Reliability, MTR, Procurement Decision). LSEs should include information for all applicable columns in the RDTv3. Information on these resources should be filed in the same RDT and LSEs should follow all instructions above regarding milestone reporting and the table of contents cover pages. The following constitutes *additional* instructions to follow for D.21-06-035 resources.

Please note:

- Projects pursuant to both D.19-11-016 and D.21-06-035 should include a note indicating how much capacity the LSE intends to apply toward each order.

Instructions by Resource Procurement Category:

Zero emissions generation, generation paired with storage, or demand response requirement: Per D.21-06-035 OP 6, LSEs are collectively required to procure 2,500 MW of zero emissions generation, generation paired with storage, or demand response resources that meet certain requirements by 2025.

- OP 6 states:

“This zero-emitting capacity shall have the following characteristics: (a) Be from a generation resource, a generation resource paired with storage (physically or contractually), or a demand response resource; (b) Be available every day from 5 p.m. to 10 p.m. (the beginning of hour ending 1800 through the end of hour ending 2200), Pacific Time, at a minimum; and (c) Be able to deliver at least 5 megawatt-hours of energy during each of these daily periods for every megawatt of incremental capacity claimed.”

- LSEs must attach an engineering assessment to their supplemental documentation to address these requirements. Staff will not provide or require a precise format for these assessments but instead outline the minimum qualifications of these assessments. Staff reserve the right to ask LSEs for additional information if insufficient detail is provided in the attached assessment. These assessments and additional documentation, if required, as well as the compliance table provided below, must be submitted via one filing prior to the required online date for this procurement category. As this procurement category is required online by June 1, 2025, these materials must be provided no later than the December 1, 2024, filing.
- It is understandable that different portions of an LSE’s portfolio for this procurement category will have different online dates and can be used toward an LSE’s annual requirements prior to the ability to show an engineering assessment for a paired resource. However, procurement will not count toward the Zero emissions generation, generation paired with storage, or demand response requirement until the LSE is able to submit the required engineering assessment and demonstrate how the resources will be paired.
 - Engineering assessments must meet the annual P50 standard set in FAQ 1.4.13 which states:

“Staff expects that the resource (or combination of paired generation and storage resources) should have, on an annual basis, at least 50% probability of being “able to deliver at least 5 MWh during each of these daily periods for every MW of incremental capacity claimed” (OP 6). If the probability is lower than 50%, then the resource does not comply with the decision and is ineligible. Staff expresses this standard as: the resource's annual P50 during the 5-hour period from 5 p.m. to 10 p.m. Pacific Time must be at least 1,825 MWh (5 x 365) for every MW of incremental net qualifying capacity claimed by the LSE to meet this procurement requirement.”

- Engineering assessments should be in accordance with standard industry practice, per FAQ 1.4.13 which states:

“Staff expects that the assessment should use standard practices in renewables and storage project financing (for example, taking into account battery charging restrictions, round trip losses, and with the probabilistic assessment considering standard sources of uncertainty including interannual resource variability). Staff expects that the only atypical aspect of this is the daily 5-hour window focus of this category of the procurement order.”

- The engineering assessment must clearly state how the storage resource will be paired with the generating resource, if using paired resources. If only a portion of one or both resources is being used toward this requirement, that must be specified.
- The LSE should include the location of the engineering assessment in the table of contents cover page.
- The LSE may provide additional information if it is necessary for Staff to assess compliance of their resource or paired resources with OP6 and all of D.21-06-035.
- If an energy-only resource is being paired with a storage resource, the LSE must meet the P50 assessment *within the CAISO footprint*. This is staff's expectation of how an LSE would need to manage the use of a resource that is not deliverable in this situation. The LSE would need to show via the engineering assessment that sufficient energy will be provided specifically in CAISO to charge the battery prior to 5pm for 5 hours of discharge. The energy-only solar's capacity would not count directly at all towards the LSE's procurement requirement, since per FAQ 1.1.2 resources must be deliverable. (Staff notes that even if the solar was deliverable, it follows from the P50 standard set in FAQ 1.4.13 that is highly unlikely to contribute materially to reliability between 5p.m. and 10 p.m. other than by charging the storage earlier in the day; so it is likely that just the ELCC of the storage that is able to be counted towards an LSE's procurement requirement for this category anyway).
- LSEs must review all requirements in D.21-06-035, as well as staff's responses to FAQ (particularly FAQ 1.4.13) to ensure they are complying with all requirements.
- To streamline review of compliance with these requirements, LSEs should complete the following table for each paired resource being shown towards their required procurement for this category. The engineering assessment/s should be source document/s for item D.

Name of Paired Resource Being Shown for Compliance with D.21-06-035 OP6: *ABC solar and storage*

Item	Value	Source Documents (including relevant page numbers) and/or Working
A. Generator nameplate capacity (MW)		
B. Storage nameplate capacity (MW)		
C. Storage duration (MWh)		
D. Annual P50 of combined resource during the 5-hour period from 5 p.m. to 10 p.m. Pacific Time (MWh)		
E. Reliability capacity being shown for counting towards the LSE's required procurement for this category (NQC MW)		
F. Eligibility test: Is $D / E \geq 1,825$? (Yes/No) (If No, then the paired resource is ineligible)		Not applicable

Long Lead-Time Resources:

- Long Duration Energy Storage – Contracts for long duration energy storage must note that the storage resource is able to discharge for at least eight hours at full nameplate value, per D.21-06-035, OP 2(a). Hybrid or paired resources can be used for this requirement as long as the storage portion of resource meets the above requirement, per FAQ 1.3.1. Additionally, per FAQ 1.3.1, if a hybrid resource is used, an engineering assessment must be submitted that demonstrates compliance with this requirement. The LSE should include the page number that an assessment of the resource's discharge capabilities can be found in the table of contents cover page. An engineering assessment is not required if the resource is not hybrid.
- Firm Zero Emission – Resources meeting the 1,000 MW NQC firm zero emission requirement must have an 80% capacity factor, per D.21-06-035, OP 2 (b). This will be based on forecasted capacity factor based on the latest available design. LSEs should provide an engineering assessment to demonstrate that their resource meets the capacity factor requirement. Per instruction in section 4, LSEs must re-submit materials that have been modified or amended. LSEs should re-submit this assessment if substantive changes are made to the resource design that lower the capacity factor below the requirements for firm zero emission resource procurement. The LSE should include the page number that an assessment of the resource's capacity factor can be found in the table of contents cover page.
- Long Lead-Time (LLT) Resource Extension- LSEs who have not been able to procure all or a portion of either LLT category for a 2026 COD may apply for an extension to a COD of no later than June 1, 2028. LSEs must submit this request labeled as "Long Lead-Time Resource Procurement Obligation Deadline Extension Request for [Entity Name]." D.21-06-035 OP5 details the minimum standard for Commission consider of LSE "good faith effort," and all requests that meet that minimum standard will receive consideration. To assist Commission

Staff with understanding an LSE's good faith effort, this request should include the following:

- (a) a narrative description that outlines what portion of the LSE's LLT requirement the LSE is requesting extension for, a description of the attempt to procure a 2026 COD resource, and a description of the later COD resource that was instead procured.
- (b) Evidence of a solicitation and/or Evidence of bids in a solicitation. Please include an affidavit if insufficient bids for a 2026 resource were accepted and state reason why. Please include the following information, at minimum: Counterparty, Project name, Technology, COD, County, and Total Nameplate Capacity.
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- (c) an executed contract for a 2027 or 2028 COD resource as well as the following if available: Evidence of site control; An interconnection agreement; and a notice to proceed. If a contract has not been executed, the LSE can provide other earlier indications of which project they are pursuing such as draft contract materials or a narrative description of the status of negotiations
- LSEs that fully meet the above requirements should expect to receive an extension. Extensions may or may not be granted to LSEs that only meet partial requirements. These additional requirements are to provide LSEs confidence that Commission will look favorably on requests that indicate procurement progress.
- LSEs may be required to submit this extension request as an advice letter, pending additional Commission action to clarify this. If no further Commission action is taken, LSEs may submit this request with their compliance filings.

Bridge Resources: Please be sure to review D.21-06-035, D.22-02-004, and staff's responses to FAQ for all requirements regarding bridge resources. Bridge Resources should be explained and described in the LSE's remediation plan document. Bridge resources must also follow all the same requirements as other MTR compliant resources including instructions for entering into the RDT and backstop / milestone documentation submission. Staff expects, but does not require, that bridge resources be in place for fewer than six months. If a bridge resource is in place for fewer than six months, no engineering assessments need to be submitted for that resource.

Substituting Delayed D.19-11-016 Capacity for D.21-06-035 Procurement: If an LSE submitted a resource for D.19-11-016 that was put in the baseline for D.21-06-035 and that resource has not yet come online, the LSE may follow the instructions provided in the "Instructions and Template for LSEs Substituting Delayed Excess D.19-11-016 Procurement Capacity for D.21-06-035 Mid-Term Reliability (MTR) Procurement" document to count their resource toward D.21-06-035 instead. This requires that: (1) the resource will come online during the D.21-06-035 compliance period and that (2) The LSE has met their D.19-11-016 obligations with other resources. All requirements put forth in the referenced documentation must be met before or at the time of the February 1, 2023, filing. Additional information is also provided in FAQ 5.4.7.

Emergency/ Summer Reliability Resources: In some circumstances, IOUs have submitted advice letters and received approval for resource procurement to meet summer reliability requirements. If the IOU seeks to change the use of the resource such that it now will be used to meet some of their MTR obligations, Staff expects the IOU may need to make a filing identifying the change in the designation of

the resource from being a summer reliability resources to being an MTR resource, and the resulting change in CAM treatment.

6. Detailed Instruction on Project Progress Tracking Requests:

For purposes of keeping our project status information up-to-date, LSEs are also required to provide information on the following project types:

- LSEs should include any projects with contract statuses planned, development, or review as of 2/1/2023, as well as any projects that came online after 1/1/2022 in the LA Basin local capacity area, even if not pursuant to either IRP procurement order.
 - LSEs should use the sub-area column
 - LSEs should complete all applicable columns in the RDTv3 for these projects.
 - LSEs should not include any supplemental documentation for these projects, unless they are pursuant to D.19-11-016 or D.21-06-035.

7. Submission Date:

Each LSE must submit a completed RDTv3 along with supporting materials to the CPUC by 5 PM on Wednesday, February 1, 2023.

8. Submission Instructions:

- a. Informal Provision:** Please submit all materials to irpdatarequest@cpuc.ca.gov through the CPUC FTP website. The LSE should file the RDTv3 utilizing the instructions in this document and “RDTv3 User Guide”. LSEs may consider some contractual information confidential and wish to file accordingly. In that case, LSEs need to submit two versions of their RDTv3s (confidential and public). Filers who do not already have a CPUC secure FTP account should follow the instructions on the [secure FTP site](#). From within the secure FTP application, users can send secure emails to CPUC staff with large attachments. This mechanism allows filers to transmit their complete filing to CPUC staff including any portions deemed confidential.

Before submitting, please change the RDTv3 file name using the following naming convention. The file name must contain the 5 elements below, in the order provided. Use an underscore to separate each element. All letters should be in lower-case.

1. The LSE's abbreviation, provided in the Resource Data Template's workbook in the "lse_names" tab
2. "rdtv3"
3. "38mmt"
4. Confidential vs. Public: written as "confidential" or "public"
5. Version number, written as the letter "v", followed by a number. If you have to re-submit a file for any reason, increase this number by 1.

- b. **Formal Filing:** Parties should also read carefully and follow Rule 1.5 through 1.14 of the Commission’s Rules of Practice and Procedure when preparing and submitting their filings, available here:

<http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M209/K618/209618807.PDF>

Below is a summary of the basic steps, in anticipation of the likely needs of many LSEs in this proceeding. This guidance is not intended to modify, in any way, the requirements set forth in the Commission’s Rules of Practice and Procedure, which are considered authoritative.

- **E-filing**

- When making the formal filing, LSEs are encouraged to utilize the Commission’s electronic e-filing system and select the document type “compliance filing.”
- When e-filed, documents must be PDF/A compliant (see Rule 1.13).
- All materials should be e-filed, including PDF/A compliant versions of public spreadsheet materials, EIA forms, etc.
- Filers should include the verification required by Rule 1.11.
- Filers should also include a certificate of service (service requirements are discussed further below).
- If a document is larger than 50 pages or 3.5 megabytes, the filer should instead file and serve a “notice of availability” with a link to the materials housed on its own web site in a publicly accessible format (see Rule 1.9(d)).
- The filing deadline is February 1, 2023 before 5 p.m.

- **Confidential Materials**

- The LSE should file the RDTv3 utilizing the instructions in this document and “RDTv3 User Guide”. LSEs will likely consider certain contractual information confidential and wish to file accordingly.
- Along with the confidential version of its materials, the LSE will need to separately file a “motion to file under seal” detailing the justification for keeping the material confidential, following the guidance in the Commission’s decision D.06-06-066 for these purposes (see Rule 11.4; there is also detailed guidance contained on the following page on the Commission’s Practitioner Page web site: <https://www.cpuc.ca.gov/about-cpuc/divisions/administrative-law-judges/practitioners-page>, look for link titled: “Filing Confidential Documents Under Seal (Rev. Nov 2013)).
- The confidential version of the LSE’s materials may be submitted under seal in hard copy form, or if the material exceeds 3.5 megabytes, may be submitted on an archival DVD directly to the Docket Office. For more detailed guidance on this issue, also see the

Practitioner's Page at <https://www.cpuc.ca.gov/about-cpuc/divisions/administrative-law-judges/practitioners-page>, look for link titled: "Mixed Media Filings: Cutting Edge Filing Techniques to Accommodate Multiple & Voluminous Media Formats."

- LSEs should also ensure that confidential materials are delivered to Commission staff electronically immediately, regardless of the formal filing status, so that staff can begin analysis (see further details below).

- **Service of Materials**

- All public versions of filed materials should be served on all members of the "service list" of this proceeding (See Rule 1.13).

- The service list can be downloaded from the docket card for this proceeding or from the Commission's service list webpage, by clicking on "download comma-delimited file."

- Email service is generally preferred, but has some limitations:

- Some email servers will not accept or deliver messages to groups of more than 100 addresses. Thus, serving the whole service list may require dividing up distribution into smaller groups of recipients.

- Document size is also limited if serving by email, and thus a notice of availability with a public web site link is preferred for large documents and underlying materials. Such an approach will also make spreadsheet materials more accessible and useful.

- Service should be performed on the same day as filing (February 1, 2023), before 5 p.m.

If you have specific technical questions about this general formal filing guidance, you may contact the Commission's Docket Office at efile-help@cpuc.ca.gov or call (415) 703-2121.